

Person Filing: Clayton Echard
 Address (if not protected): [REDACTED]
 City, State, Zip Code: Scottsdale AZ 85251
 Telephone: [REDACTED]
 Email Address: [REDACTED]
 ATLAS Number: _____
 Lawyer's Bar Number: _____

JEFF FINE
 Clerk of the Superior Court
 By Debra Lugo, Deputy
 Date 08/21/2023 Time 11:51:15
 Description Amount
 ----- CASE# FC2023-052114 -----
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 ANS:LEGAL DEC MKNG ANS [REDACTED]

 TOTAL AMOUNT [REDACTED]
 Receipt# [REDACTED] USE ONLY

Representing Self, without a Lawyer or Attorney for Petitioner OR Respondent

SUPERIOR COURT OF ARIZONA IN MARICOPA COUNTY

Laura Owens
 Name of Petitioner / Party A

Case Number: FC 2023-052114

**RESPONSE TO PETITION TO
 ESTABLISH PATERNITY and
 (Check all boxes as they appear on
 the Petition)**

Clayton Echard
 Name of Respondent / Party B

- LEGAL DECISION-MAKING
- PARENTING TIME
- CHILD SUPPORT
- VITAL RECORDS

STATEMENTS TO THE COURT UNDER PENALTY OF PERJURY:

1. INFORMATION ABOUT THE OTHER PARTY

Name: Laura Owens
 Address: [REDACTED]
 Date of Birth: [REDACTED]
 Occupation: Horse sales/podcast host
 Relationship to children for whom the other Party wants the Court Order:

- Mother
- Father or Claims to be the Father
- Other. (Explain) Party A is making up this entire claim and is refusing a paternity test

2. INFORMATION ABOUT ME

Name: Clayton Echard
 Address: [REDACTED]
 Date of Birth: [REDACTED]
 Occupation: Realtor/Wellness Advocate
 MY Relationship to children for whom the other Party wants the Court Order:

- Mother
- Father or Claims to be the Father
- Other. (Explain) Pregnancy has not been proven, neither has paternity

3. VENUE: (Check box if true)

- This is **NOT** the proper court to bring this lawsuit under Arizona law because it is not the county of residence of Party A, or Party B, or the minor child(ren).

4. JURISDICTION: (Check all boxes that are true.)

- This Court **does not have jurisdiction** under A.R.S. §§ 25-502 and 25-1221 *et. seq.* to order a party to pay child support.
- This Court **does not have jurisdiction** to decide legal decision-making matters under Arizona law, A.R.S. §§ 25-402, and 25-1031.

Summary of what I say about **VENUE** and **JURISDICTION** that is different from what the other Party said in the Petition:

Party A is unwilling to do a paternity test, therefore, paternity is unable to be proven

5. INFORMATION ABOUT MINOR CHILDREN is contained in the Petition and/or Affidavit Regarding Minor Children contained within the Petition or filed with the Petition and incorporated by reference.

Summary of what I say about the **MINOR CHILDREN** that is different from what the other Party stated in the Petition:

N/A - no proof of children shown, no proof of paternity

STATEMENTS ABOUT PATERNITY:**6. WHY YOU THINK YOU OR THE OTHER PERSON IS NOT A LEGAL PARENT OF THE MINOR CHILD(REN):** (Check all boxes that apply)

- A. **AFFIDAVIT:** Party A and Party B **did not sign an Affidavit or Acknowledgment of Paternity** acknowledging that Party A or Party B is the child(ren)'s natural father.
- B. **BIRTH CERTIFICATE:** Party A or Party B **is not named as the father** on the minor child(ren)'s birth certificate(s), and (if applicable) the name listed below is listed as the father on minor children's birth certificates:
- _____
- C. **DNA/BLOOD TEST:** The parties had DNA (Deoxyribonucleic Acid) testing administered and Party A or Party B is shown **not** to be the minor child(ren)'s natural father. A copy of the test results is attached to this Response.

- D. **PARTIES NOT LIVING TOGETHER:** Party A and Party B were not married to each other at any time during the ten months before the birth of the minor child(ren). The parties did not live together during the period(s) when the minor child(ren) could have been conceived.
- E. **NO SEXUAL INTERCOURSE:** Party A and Party B were not living together and did not have sexual intercourse at the probable date of conception of the minor child(ren). *Oral sex was performed, but that was all*
- F. **SEXUAL INTERCOURSE:** The mother of the minor children had sexual intercourse with someone else during the period in which the minor child(ren) could have been conceived. *Despite multiple requests, Party A refuses to take a paternity test. She sent me*
- G. **OTHER:** (explain) *an email saying she would only take a paternity test if we were to date exclusively. See Exhibit 1. Party A has threatened that she will write defamatory comments about this matter & release it to the press. See Exhibit 2!*
 Summary of what I say about **PATERNITY** that is different from what the other Party said in the Petition:
This entire petition is made up by Party A, there is no proof of paternity, upon information received and belief, Party A suffers from mental health issues. I am concerned that she is stalking me.

7. **ABOUT MARRIAGE:** (if applicable, check one box only).

- Mother was not married** at the time the minor child(ren) were born or conceived or at least 10 months before minor child(ren) were born or conceived, **OR**
- Mother was married** when minor child(ren) were born or conceived or at least 10 months before the minor child(ren) were born or conceived, but Mother's Spouse is not the parent of the minor child(ren). (Mother's Spouse must be included as a party to this court case because of marriage.)

8. **COURT CASES INVOLVING LEGAL DECISION-MAKING (LEGAL CUSTODY) OR PARENTING TIME RELATED TO CHILDREN UNDER 18 YEARS OLD.** (Check one box.)

- I HAVE** **I HAVE NOT** *N/A* been a party or witness or participated in any court case involving the physical custody, legal decision-making (legal custody), or parenting time for any of the minor children named above in this state or in any other state (If you **have**, explain below, using extra pages if necessary. **IF NOT, GO ON**).

Name of each child: _____

Court State: _____ Court location (county/city): _____

Court case number: _____ Current case status: _____

Nature (type) of court proceeding: _____

Summary of any Court Order: _____

9. COURT CASES NOT INVOLVING LEGAL DECISION-MAKING (LEGAL CUSTODY) OR PARENTING TIME RELATED TO THE CHILDREN. (Check one box.)

I HAVE I DO NOT HAVE ^{N/A} information regarding any court action in this state or any other state involving the minor child(ren) listed above that could affect this case including court cases for enforcement and relating to domestic violence, protective orders, termination of parental rights and adoptions (If you have, explain below, using extra pages if necessary. IF NOT, GO ON.)

Name of each child: _____

Court State: _____ Court location (county/city): _____

Court case number: _____ Current case status: _____

How the children are involved: _____

Summary of any Court Order: _____

10. PHYSICAL CUSTODY, LEGAL DECISION-MAKING (LEGAL CUSTODY) OR PARENTING TIME CLAIMS OF ANY PERSON. (Check one box.)

I do I do not ^{N/A} know a person other than Party A or Party B who has physical custody or who claims legal decision-making (legal custody) or parenting time rights to any of the minor children named above.

(If so, explain below, using extra pages if necessary. IF NOT, GO TO #11).

Name of each child: _____

Name of Person with the claim: _____

Address of Person with the claim: _____

Nature of the Claim: _____

OTHER STATEMENTS TO THE COURT

11. MEDICAL EXPENSES: (check the boxes that apply)

I deny paternity.

There are OR There are not unreimbursed medical expenses incurred by the mother, resulting from the birth of the child(ren). If there are, these costs and expenses should be awarded to Party A OR Party B according to law, A.R.S. § 25-809.

12. OTHER EXPENSES: The parties should OR should not be ordered to divide between them any uninsured medical, dental, or health expenses, reasonably incurred for the minor child(ren), in proportion to their respective incomes.

13. **THE PARENT INFORMATION PROGRAM (PIP)** is required for persons seeking legal decision-making authority (legal custody) or parenting time. (If you intend to ask for legal decision-making (legal custody) or parenting time, check one.)

I have I have not already completed the Parenting Information Program (PIP).

14. **DOMESTIC VIOLENCE:** (If you intend to ask for joint legal decision-making (joint legal custody), there must have been no significant domestic violence between the parties or you must provide reasons for the court to find joint legal decision-making is in the best interests of the minor(s) *despite* the domestic violence. (A.R.S. § 25-403.03). (Check one box)

There has been domestic violence in this relationship and no legal decision-making (no joint or sole legal custody) should be awarded to Party A Party B who committed the violence.

Domestic violence has not occurred in this relationship; OR

Domestic violence has occurred in this relationship but it was committed by both parties or it is otherwise still in the best interests of the minor child(ren) to award joint or sole legal decision-making (joint or sole legal custody) to the person who committed the violence *because:* (Explanation Required)

Summary of what I say about **DOMESTIC VIOLENCE** that is different from what the other Party said in the Petition.

15. **DRUG / ALCOHOL CONVICTION WITHIN LAST TWELVE MONTHS:** (If you intend to ask for joint legal decision-making (joint legal custody), check one box.)

Based on my knowledge, Neither parent has been convicted for a drug offense or driving under the influence of drugs or alcohol in the last twelve (12) months,

One or both parents have been convicted for a drug offense or driving under the influence of drugs or alcohol in the last twelve (12) months.

Party A was convicted.

Party B was convicted.

The legal decision-making (legal custody) and parenting time arrangement I am requesting appropriately protects the minor child(ren).

Explain how this arrangement appropriately protects the minor children.

Summary of what I say about **DRUG/ALCOHOL CONVICTIONS** that is different from what the other Party said in the Petition.

16. CHILD SUPPORT:

N/A

There is an Order for Child Support, dated _____ from (name of court) _____.

This order needs does not need to be changed.

There is a pending child support petition or modification currently filed in this Court or a different court.

(If you checked this box, complete the following.)

Name and Location of Court _____

Nature of the Case: _____

Status of Case: _____

To my knowledge **there is no child support order** for the minor child(ren) and the court should should not order child support in this case along with legal decision-making (legal custody), and parenting time.

Party A Party B made **voluntary / direct support payments in the amount of** \$_____ that need to be taken into account, if past support is requested.

Party A Party B owes **past support** for the period between:

the **date this Petition was filed** and the date current child support is ordered.

OR

the **date the parties started living apart**, but not more than three years before the date this Petition was filed and the date current child support is ordered.

OR

the **date the parties started living apart**, which is **MORE THAN** three years before the date of this petition was filed, and the date current child support is ordered. * If you check this box, you must explain why the Court should award past support for this time period. **EXPLAIN:** _____

B. PARENTING TIME: Award parenting time as follows:

- Reasonable parenting time rights as described in the Parenting Plan, OR
- Supervised parenting time between the children and Party A OR Party B, OR
- No parenting time rights to the Party A OR Party B.

Supervised or no parenting time is in the best interests of the minor child(ren) because:

Explanation continues on attached pages made part of this document by reference.

a. Name this person to supervise: _____

b. Restrict parenting time as follows: _____

c. Order cost of supervised parenting time (if applicable) to be paid by:

- Party A
- Party B, OR
- Shared equally by the parties.

C. LEGAL DECISION-MAKING (Legal Custody):

Award legal decision-making (legal custody) concerning the children as follows:

SOLE LEGAL DECISION-MAKING (sole legal custody) to: Party A Party B

OR

JOINT LEGAL DECISION-MAKING (joint legal custody) to BOTH PARENTS.

Party A and Party B will agree to act as joint legal decision-makers (joint legal custodians) of the minor children, as set forth in the *Joint Legal Decision-making* (joint legal custody) **Agreement** contained in the *Parenting Plan*, to be agreed upon and signed by both parties if the Court adopts the terms of the **Agreement** (The Parenting Plan is submitted later in the process). There have been no significant acts of domestic violence, as defined by Arizona law, A.R.S. § 13-3601, by either parent or it is in the best interests of the minor child(ren) to award joint legal decision-making despite any violence that occurred.

(Check "3" below if you are asking for a child support order or a change of child support in this case.)

3. CHILD SUPPORT:

- A. Order that child support be paid by Party A Party B
- in the amount set forth in the Child Support Worksheet filed with this Response and incorporated by this reference.
- OR
- in the amount of \$ _____, which is a deviation from the amount set forth under the Arizona Child Support Guidelines. I am requesting a deviation because: (EXPLAIN): _____
- B. Order that **past child support** for the period stated under #16 above, be paid by Party A Party B in an amount determined by using a retroactive application of the Arizona Child Support Guidelines taking into account any amount of **temporary or voluntary / direct support** that has been paid. Support to be paid as defined above.

4. MEDICAL, DENTAL, VISION CARE INSURANCE AND HEALTH CARE FOR MINOR CHILD(REN): Order that:

- Party A is responsible for providing: medical dental vision care insurance.
- Party B is responsible for providing: medical dental vision care insurance.
- Order that Party A and Party B pay for all reasonable unreimbursed medical, dental, vision care, and health-related expenses incurred for the minor child(ren) in proportion to their respective incomes as described on the Child Support Order, which shall be submitted with the Judgment and Order.

5. EXPENSES OF MOTHER: Order that Party A OR Party B pay a reasonable amount to cover unreimbursed expenses incurred by the mother related to the birth of the child(ren).

6. TAX EXEMPTION: Allocate tax exemptions for the minor child(ren) as determined by the Court under the Arizona Child Support Guidelines.

Under the Affordable Care Act, the parent who claims the child as a dependent on a federal tax return has the obligation to ensure that the child is covered by medical insurance and may be penalized by the IRS for failing to do so.

Parent entitled to claim	Name of minor child	in Tax Year
<input type="checkbox"/> Party A <input type="checkbox"/> Party B	_____	_____
<input type="checkbox"/> Party A <input type="checkbox"/> Party B	_____	_____
<input type="checkbox"/> Party A <input type="checkbox"/> Party B	_____	_____

Pattern shall repeat for subsequent years.

I request

7. **TESTING and COSTS:** Order that if paternity is contested, Party A and Party B be ordered to submit to such blood and tissue tests as may be necessary by this Court to establish paternity. And, that the other party pay all costs and expenses of this lawsuit under Arizona law, A.R.S. § 25-809, including blood tests or other genetic testing; filing each child's birth certificate, attorney's fees and court costs;

8. **OTHER ORDERS I AM REQUESTING:** (explain request here) I, Clayton Echard, am requesting a court-ordered paternity test and that Party A pay all costs. I also request an award of attorney's fees, pursuant to A.R.S. 25-809(G) and A.R.S. 12-349, as this case is groundless and lacking in merit. We never had sexual intercourse.

UNDER OATH OR AFFIRMATION

I swear or affirm under penalty of perjury that the contents of this document are true and correct to the best of my knowledge and belief.

08/21/23
Date

[Signature]
Signature

STATE OF Arizona

COUNTY OF Maricopa

Subscribed and sworn to or affirmed before me this: August 21, 2023
(date)

By Clayton Echard

(notary seal)

[Signature]
Deputy Clerk or Notary Public



A copy of this [redacted] to the other party on: _____
Month / Date / Year

At the following address: _____

CERTIFICATE OF SERVICE

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ORIGINAL of the foregoing filed this
21 day of August, 2023 with:

Clerk of the Court
Maricopa County Superior Court

COPY of the same delivered this
21 day of August, 2023 to:

The Honorable Julie Mata
Maricopa County Superior Court

COPY of the same sent out via USPS
First-Class Mail & by email
this 21 day of August, 2023 to:

Laura Owens



Petitioner, Pro per


By: 
Clayton Echard

EXHIBIT 1



Laura Owens

Page Six and NY Post are interested!

To: Clayton Echard

Clayton,

Please have this serve as proof that I am telling the truth, as I wouldn't put my name on the line if I weren't able to back it up. If that doesn't convince you, nothing will. I am done giving you the power when you have been so demeaning. You have belittled and humiliated me. You are emotionally and verbally abusive, and I am done protecting you. You have treated me like I am a liar, made me feel ugly and worthless, and not given a shit whether the twins and I lived or died.

Since you probably won't open the attachments, here's what I sent to Page Six and the NY Post tonight:

I have a tip regarding Clayton Echard and a pregnancy. His treatment of the mother is horrendous and consistent with his image as a manipulator. He is also not the self-help and suicide prevention advocate he claims to be. Despite his efforts on social media to prove that he is a changed man, that is not who he is in private. I have plenty of evidence. I am part of the story, but will only submit it if you keep my name anonymous. I will not give the information without signing an agreement that confirms that.

Not surprisingly, both are interested. It's your call as to whether or not I respond. Again, I have all the proof in the world to back it up and would never submit this if I wasn't 1000000% sure that you are the father. If you're going to pull your "monthly message" attitude, I'm not going to continue to keep this private. Maybe if it's public you will step up, and by my actions, you can tell I am dead serious about making it that way. Remember, you threatened that to me tonight as well and if you want to make it public yourself, be my guest.

I am owed an apology for the way you have treated me and you would be lucky to have the opportunity to explore things with me, not the other way around. Let me know tonight. I'm done giving you the power.

All the best,



Laura Owens

Nobody Told Me | Quarter Notes | ELIXIR

Now available! Read my story in the 80th Anniversary Edition of Children's Secret for the Soul



Phone

Email

[Gmail - Page Six_Redacted.pdf](#)

[Gmail - Tip_Redacted.pdf](#)



Laura Owens

Important

To: Clayton Eckard

Clayton,

I was going to ask if you wanted to read the article I wrote before submitting it to the Huffington Post, but I know you won't respond so I'll take it that I have your permission to send it in as is. Before I do that and prior to your work getting involved with withholding income for child support, I wanted to ask one last time about the agreement. I added a few things to it that are in bold. Here it is:

Version 4 - Relationship Non-Disclosure Ag...

I also contacted another abortion pill company who said we could still do it at this point if we wanted to. You haven't and aren't putting pressure on me to do that, but it is *really* important that we talk about this if you don't want to have the twins with me. Your behavior leads me to believe that would be your preference, so you need to say something if it is. I will not hold it against you whatsoever if you sign the agreement. If you don't, that's fine, but we are having them.

I just want to have a fresh start and remove all of this animosity from the picture. We need to be making smart decisions right now, not ones driven by emotions. Neither one of us wanted this, but it's happened, and we need to make smart choices. If I don't hear back, then fine, we can continue like this and I will submit my piece to Huff Post, but your unresponsiveness is getting you nowhere with me and will get you in trouble with the court.

Please simply consider the agreement with modifications. It is written entirely in your favor, not mine.

All the best,

Laura Owens

Nobody Told Me! | *Quartet Farms* | TEDx talk
Now available! Read my story in the 20th Anniversary Edition of Chicken Soup for the Soul



Laura Owens

Re: Important

To: Clayton Eckard

Here are the changes:

IV. Terms of the agreement.

The Couple agrees that:

1. For a period of one week, while determining the best course of action for their pregnancy, Party A and Party B, will exclusively explore a relationship with "intention", meaning with the goal of it turning into something long-lasting and meaningful. There is no obligation to engage in intercourse if either Party is uncomfortable with the act.
2. From the date that this agreement is signed until one week after, no action whatsoever will be taken in FC2023-052114 or in any family, civil, or criminal court case.
3. Party A and Party B agree to take a paternity test with the lab of Party A's choice, Ravgen, and will schedule it within 24 hours of when this agreement is signed.
4. After the paternity test results come back providing Party A to be the father of Party B's twins, then Party B will execute a HIPAA release for Party B to discuss the pregnancy with any of Party A's providers from the date of conception (May 20th) through the end of the pregnancy in February 2024.
5. If a joint decision is made to terminate the pregnancy, then Party A and Party B will stipulate to dismiss FC2023-052114 once the pregnancy is confirmed by a doctor to no longer be viable. Party B will pay Party A's legal fees to date.
6. During the one week period, if the decision is made to continue the pregnancy, then Party A and Party B will discuss what would make the best situation for the children, whether that be raising them together or apart. The goal would be to keep the case out of the court and to avoid accruing continued legal fees. FC2023-052114 will remain active until an agreement is made outside of court, then the parties will stipulate to dismiss it.
7. There is no obligation for the relationship to work out beyond the one week, however if it is apparent that this agreement was entered into for the wrong reasons, evidenced by abuse of any kind (verbal, emotional, or physical), it is null and void.
8. At the end of the one week period, provided the terms have been met, then Party A and Party B are forever barred from bringing charges against each other for any reason up to that date.